

Hon. Judge Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DANIEL LOZANO RODRIGUEZ,

Plaintiff,

v.

KENNETH T. CUCCINELLI, et al.

Defendants.

NO. 2:20-cv-00569-MJP

Stipulated Motion to Extend
Deadlines

Note on Motion Calendar: July
16, 2020

The parties, pursuant to Local Rules 10(g) and 16, hereby jointly stipulate and move for a 60-day extension of their deadline to file a Joint Status Report and Discovery Plan, and of Defendants' deadline to Answer the Complaint. The Joint Status Report and Answer are currently due July 27 and August 4, 2020, respectively; the new deadlines would be September 25 and October 5, 2020.

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. See *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). The parties submit there is good cause for an extension of these deadlines. Defendants are working

1 to schedule Plaintiff's I-485 interview and intend to adjudicate the I-485
2 Application for lawful permanent resident status promptly thereafter.
3 Adjudication of Plaintiff's I-485 Application would fully resolve this mandamus
4 action without the time and expense of further litigation.

5 Accordingly, the parties seek a 60-day extension of their deadline to file a
6 Joint Status Report and Defendants' deadline to file the Answer.

7
8 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

9 DATED: July 16, 2020

s/ Alexandra Lozano

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18 DATED: July 16, 2020

s/ Kyle A. Forsyth

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Attorney for Defendants

ORDER

IT IS SO ORDERED.

Dated this 16th day of July, 2020.



Marsha J. Pechman
United States Senior District Judge